

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,
Plaintiff,
Counter-defendant,

vs.

Case No. 4:20-cv-05640

YGR

APPLE INC.,

Defendant,
Counterclaimant.

IN RE APPLE iPhone
ANTITRUST LITIGATION

Case No. 4:11-cv-06714

YGR

(caption cont'd)

HIGHLY CONFIDENTIAL OUTSIDE ATTORNEYS' EYES ONLY

ZOOM DEPOSITION OF LORI WRIGHT

(Reported Remotely via Video & Web Videoconference)

Palo Alto, California (Deponent's location)

Friday, April 16, 2021

Volume I

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1 is used for the xCloud? 10:08:30

2 A. No.

3 Q. Okay. Do you have any company documents

4 or emails that relate to the xCloud?

5 A. Yes. 10:08:40

6 Q. You have a lot of them, don't you?

7 A. Yes.

8 Q. Okay. And some of them you reviewed in

9 connection with this deposition, correct?

10 A. I reviewed my own emails on the topic, 10:08:49

11 yes, that Apple also has, because all of them were

12 sent to Apple.

13 Q. Well, you also have internal emails on

14 the xCloud, correct?

15 A. Yes. 10:09:02

16 Q. Okay. You have a fair amount of internal

17 emails with regard to xCloud, I assume, right?

18 A. I don't know what a "fair amount" is.

19 Q. More than two dozen.

20 A. I don't know. 10:09:14

21 Q. You don't know.

22 Did you review any internal emails with

23 regard to xCloud in preparation for this

24 deposition?

25 A. Did I review -- I'm sorry, repeat it one 10:09:25

1 A. The one that I saw for the first time 04:03:47
2 today? Yes.

3 Q. Okay. So you hadn't -- okay. That's
4 fine.

5 THE COURT REPORTER: Hold on. Hold on. 04:03:53
6 Hold on.

7 (Technical issues;

8 Discussion off the stenographic record.)

9 Q. (By Mr. Calandra) Fair enough to say you
10 haven't seen any communications with the Coalition 04:04:26
11 for App Fairness, I assume, right?

12 A. That's accurate.

13 Q. Okay. Now, do you -- do you have --
14 maybe -- maybe you've answered this, but do you
15 have any communications in your files relating to
16 Epic?

17 A. That's broad. I don't -- maybe.

18 Q. And -- and why would you -- why would you
19 have any communications in your files relating to
20 Epic?

21 MR. CHIAPPETTA: Calls for speculation.

22 THE DEPONENT: I'm in the gaming
23 organization. I'm a member of the gaming
24 leadership team. Emails get sent. I don't know.
25 Perhaps there's emails there. I don't know.